

## Data Retention Policy

### 1. Purpose

This Data Retention Policy sets out how Healthwatch Worcestershire (HWW) manages the retention and disposal of personal data in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- HWW's registration with the Information Commissioner's Office (ICO).
- Other applicable UK legal and regulatory requirements

HWW is committed to ensuring that personal data is:

- Kept only for as long as necessary
- Stored securely
- Disposed of safely and lawfully

### 2. Scope

This policy applies to:

- All personal data processed by HWW
- All employees, volunteers, temporary staff, contractors, and third parties acting on behalf of HWW
- All formats of data, including electronic, paper, email, audio, and visual records

### 3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable living individual.
- **Special Category Data:** Personal data revealing racial or ethnic origin, political opinions, religious beliefs, health data, or similar protected characteristics.
- **Processing:** Any operation performed on personal data, including collection, storage, use, disclosure, or deletion.
- **Data Subject:** The individual to whom the personal data relates.

### 4. Data Protection Principles

HWW follows the UK GDPR data protection principles, ensuring that personal data is:

1. Processed lawfully, fairly, and transparently
2. Collected for specified, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary
4. Accurate and kept up to date
5. Kept no longer than necessary
6. Processed securely

The minimum amount of data should be collected to meet processing needs.

### 5. Retention Periods

Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected, including legal, contractual, accounting, or regulatory obligations.

See Appendix 1 – Deletion Schedule for details of specific Retention periods for different types of records.

See Appendix 2 – Deletion Record for details of most recent deletions of each category of data.

Please note that listed Retention periods may be extended where required for legal claims, regulatory investigations, statutory obligations, complaints, or safeguarding issues. Hold extensions may only be applied with the authority of the Data Protection Officer (DPO), or any director.

## 6. Review of Data

- Data owners or managers must review personal data regularly to ensure it remains necessary and accurate.
- Data that is no longer required must be securely deleted or anonymised.
- Retention schedules will be reviewed **at least annually**.

## 7. Secure Storage

HWW ensures that personal data is stored securely by:

- Restricting access to authorised personnel only
- Using password protection, encryption, and secure networks
- Locking physical files in secure cabinets
- Ensuring third-party processors provide appropriate security assurances
- HWW use Microsoft 365 for all technical operations – including Outlook, Teams etc, with data stored through Sharepoint in UK data centres.
- HWW use licensed Microsoft 365 Copilot Business.
- HWW's operations currently meet the requirements of Cyber Essentials accreditation.

## 8. Data Disposal

When personal data reaches the end of its retention period, it will be disposed of securely:

- **Electronic data:** permanently deleted from systems
- **Paper records:** shredded or disposed of using confidential waste services
- **Devices:** wiped or destroyed before disposal or reuse

## 9. Special Category Data

Special category data will be:

- Retained for the shortest possible time and only where a clear lawful basis and special category condition apply.
- Deleted or anonymised as soon as it is no longer required for the stated purpose; routine “just in case” retention is not permitted.
- Subject to stricter retention controls: any extension beyond the standard retention period must be documented, time-limited, and approved by the DPO, or a Director, with a recorded review date.

- Where longer retention is justified (e.g., safeguarding, complaints handling, legal claims, regulatory requirements, or statutory obligations), the justification must specify the reason, minimum necessary duration, and why anonymisation or redaction is not sufficient.
- Protected by enhanced access controls: least-privilege access, role-based permissions, access to particularly sensitive records must be approved by the DPO, or a director. Inappropriate access will be treated as a potential data breach.

## 10. Data Subject Rights

Data subjects have the right to request:

- Access to their personal data
- Rectification of inaccurate data
- Erasure of data where legally permissible
- Restriction or objection to processing

Requests must be handled in accordance with HWW's **Data Protection Policy** and statutory timescales.

## 11. Responsibilities

- **Data Protection Officer (DPO):** Overall accountability for compliance
- **Directors/Chief Officers:** Ensure data within their areas is retained and disposed of correctly
- **All Staff:** Must comply with this policy and report concerns or breaches immediately

## 12. Breaches

Any suspected or actual data breach must be reported immediately in line with HWW's **Data Protection Policy**.

## 13. Policy review

This Policy will be reviewed at least every two years (see table below), however a review will also be triggered by any of the following

- Data security incidents (defined as being reportable to the Information Commissioners Office (ICO))
- Complaint from a data subject.
- Changes to applicable legislation e.g. UK GDPR, Data Protection Act
- Operational Changes involving new technology or data collection methods.

## Document Details & Version Control

Version	Comments /Reason for Amendments	Lead Director	Author / Editor	Date	Review by
1	Increase in home working due to Covid	JR	JR	11/19	
1.0	Reviewed – no amendments	JR		11/21	
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2.3	Enhanced controls added to 9, Special Category Data section	DB	PH	05/05/26	
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